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MEMO ENDORSED

April 9, 2008

BY FAX: (212) 805-7949

Honorable P. Kevin Castel
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street, Room 2260
Brooklyn, NY 11201

Re: Antonio Madera v. City of New York, et al.
08-CV-1509 (PKC)(THK)

*Appellate granted.
SO ORDERED
[Signature]
USDJ
4-9-08*

Your Honor:

I am Senior Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, supervising the defense of the above-referenced federal civil rights lawsuit.¹ I respectfully write to request an additional seven day enlargement of time for defendant City of New York to answer or otherwise respond to the complaint from April 9, 2008, to April 16, 2008. Plaintiff's counsel, Andrew B. Stoll, Esq., consents to this request.

The reason for this request is that this office is continuing to search for information related to plaintiff's claims, which cover three different dates, namely November 19, 2006, December 8, 2006, and December 21, 2006. We have received information regarding the incident on November 11, 2006. However, we are still awaiting information regarding the incidents which occurred in December of 2006.² Moreover, our Department of Correction

¹ This case has been assigned to Assistant Corporation Counsel Maurice Hudson, who will be admitted to practice in New York State on April 28, 2008; our office anticipates his admission to the Southern District in May, 2008. Mr. Hudson is handling this matter under my supervision. Mr. Hudson may be reached directly at (212) 788-8684.

² I respectfully note for the Court's information that based on the limited descriptions in plaintiff's complaint regarding the December 8, 2006, incident, this office attempted to interview one of the named correction officers (Johnson) on April 3, 2008. However, this officer was not

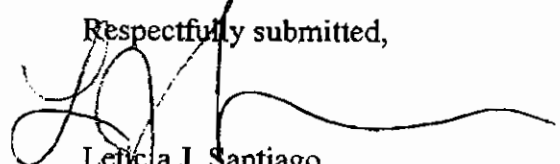
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liaison, Katherine Ajayi, Esq., has recently returned to the office after being out for several days to attend to personal matters. Ms. Ajayi is presently assisting us with obtaining additional information and has submitted an expedited request so that we may receive the information in the next few days.

This is defendant City of New York's second request for an enlargement of time to respond to the complaint; on March 11, 2008, Your Honor granted the City's first request for a thirty day enlargement of time to April 9, 2008. This request does not affect the Initial Conference presently scheduled before Your Honor on April 18, 2008. Accordingly, it is respectfully requested that defendant's time to answer or otherwise respond to the complaint be enlarged from April 9, 2008, to April 16, 2008.

Thank you for your attention to this matter.

Respectfully submitted,



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present in the facility on the date and time of the alleged incident and therefore could not provide us with any useful information.